

BREDHOFF & KAISER, P.L.L.C.

Attorneys & Counselors

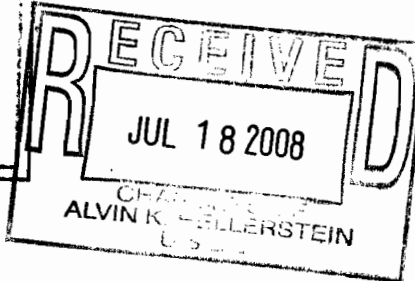
Robert M. Weinberg
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Mady Gilson
Bruce R. Lerner
Andrew D. Roth
John M. West
Douglas L. Greenfield
Roger Pollak
Anne Ronnel Mayerson
Leon Dayan
Devki K. Virk
Robert Alexander

805 Fifteenth Street, NW
Washington, D.C. 20005
(202) 842-2600
Facsimile: (202) 842-1888
www.bredhoff.com

Kathleen Keller
Abigail V. Carter
Matthew Clash-Drexler
Jennifer L. Hunter
Joshua B. Shiffrin
Ramya Ravindran
Benjamin Takis
Daniel A. Zibel

Laurence Gold
Patricia Polach
Susan G. Lahne
Todd E. Edelman
Sarah M. Fox
Page Kennedy
Of Counsel

July 18, 2008



Elliot Bredhoff
(1921-2004)
Henry Kaiser
(1911-1989)

Via Facsimile Only

Hon. Alvin K. Hellerstein
United States District Court
Southern District of New York
500 Pearl Street, Room 1050
New York, NY 10007
FAX No. 212.805.7942

Re: *Allied International Union v. Service Employees International Union, Local 32BJ, et al.*, No. 1:08-cv-3357-AKH

Dear Judge Hellerstein:

I am writing on behalf of defendants SEIU Local 32BJ, SEIU Local 1877, Michael Fishman, Andrew Friedman, and Neil Diaz, to request an extension of time within which to file defendants' reply brief in support of their motion to dismiss. Attorney James Reif, who represents defendant Service Employees International Union, joins in this request.

Defendants filed their Joint Motion to Dismiss on May 29, 2008. Plaintiff filed a Memorandum in opposition to that motion on July 16. Defendants' reply brief is currently due on July 31. Defendants respectfully request that the deadline for their reply brief be extended to September 5, 2008.

The request is made necessary by other professional and personal obligations during the next six weeks of undersigned counsel (who is principally responsible for preparation of the reply brief), including a reply brief on an expedited motion for summary judgment in *Ford v. Browning*, No. 37 2008-CA-1905 (Fla. 2d Jud. Cir.); an appellate brief in *Parker v. AMR Corp. et al.*, No. 08-16031 (9th Cir.); a long-planned family vacation August 1-14; depositions and other discovery in *Jolicoeur-Vasseur v. Association of*

*So advised
7-18-08
Alvin K. Hellerstein*

Hon. Alvin K. Hellerstein
July 18, 2008
Page 2

Professional Flight Attendants, No. 1:08-cv-0853 (N.D. Ill); and oral argument on August 28 in *Posey v. Lake Pend Oreille School District*, No. 07-35188 (9th Cir.).

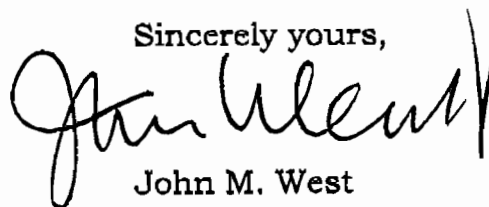
Defendants have not previously requested any extension of time with respect to this brief, although they requested and were granted an extension of the time to answer or otherwise respond to the complaint from April 29 to May 29, 2008. Defendants also consented to plaintiff's request for an extension of time to respond to the motion to dismiss from June 16 to July 16, 2008, which the Court also granted.

I have consulted with Kevin M. Hart, counsel for plaintiff, who has authorized me to state that plaintiff has no objection to this request for extension.

No other dates are currently scheduled in this litigation.

Thank you very much for your consideration of this request.

Sincerely yours,

A handwritten signature in black ink, appearing to read "John M. West", is written over the typed name.

John M. West

cc: Kevin M. Hart - by fax 609.896.0629
Dennis M. Devaney - by fax 248.645.2690
James M. Reif - by fax 212.228.7654
Larry Engelstein - by fax 212.388.2062